

EXHIBIT AC

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

	§	
	§	
UNILOC USA, INC., and	§	
UNILOC LUXEMBOURG, S.A.,	§	Civil Action No. 2:17-cv-00258-JRG
	§	
Plaintiffs,	§	
	§	
v.	§	
	§	
APPLE INC.,	§	
	§	JURY TRIAL DEMANDED
Defendant.	§	
	§	

**DECLARATION OF SEAN BURDICK IN SUPPORT OF
PLAINTIFF’S OPPOSITION TO DEFENDANT APPLE INC.’S
MOTION TO CHANGE VENUE TO
THE NORTHERN DISTRICT OF CALIFORNIA**

1. I, Sean Burdick, am over the age of twenty-one and I am in all respects competent to make this declaration. I have personal knowledge of the facts set forth below, and the factual matters set forth below are true and correct to the best of my knowledge and belief.
2. I am President and General Counsel for Uniloc USA, Inc.
3. I reside in Plano and work at Uniloc’s office in Plano, Texas.
4. Uniloc opened its office in Plano, Texas in 2007.
5. Uniloc has maintained an office in Tyler, Texas since June 2009.
6. Uniloc became a Texas corporation in 2010.
7. Uniloc’s principal place of business since April 2012 has been its present Plano, Texas location.
8. Uniloc’s home forum is the Eastern District of Texas.

9. Uniloc has no personnel, offices or documents located in the judicial Northern District of California.

10. Uniloc had only one full-time employee, Tanya Kiatkulpiboone working at its office in Irvine, California as of April 2017.

11. Since prior to April 2017, Uniloc's physical documents relating to the patents asserted in this case have been located at Uniloc's office in Plano, Texas, not in California.

12. In addition to myself, there are two other employees, Sharon Seltzer and Kristina Pangan, who work full-time at Uniloc's Plano, Texas office who have knowledge regarding Uniloc's day-to-day business activities.

13. Knowledge that I have that may be relevant to the present litigation includes: (1) the relationship between Uniloc USA, Inc. and Uniloc Luxembourg S.A., (2) information regarding the acquisition by Uniloc of the patents asserted in this case, and (3) Uniloc's licensing activities.

14. Several former employees of Uniloc having historical knowledge regarding Uniloc's business reside in or around this District, including Sara Godecke, Bethany Perkins, Zach Jacobs, Sridevi Vemuri and Sarah Baker.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on June 30, 2017 at Plano, Texas.

A handwritten signature in blue ink, appearing to read "Jerald Rudin", is written over a horizontal line.